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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re: STEPHEN TRENT WOOLSTON, Debtor.	Bankruptcy No.: 17-23473 KRA (Chapter 7) Judge: Kevin R. Anderson
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**CREDITOR'S MOTION TO EXTEND DEADLINES UNDER
11 U.S.C. §§523 AND 727**

COMES NOW Farhad Iravani, a Creditor in the above-entitled Bankruptcy case (hereinafter referred to as "Creditor"), by and through his Attorneys of Record, more specifically **JLT LAW**, and pursuant to Bankruptcy Rules 4004(b) and 4007(c), hereby respectfully moves the Court to extend the time for filing Complaints Objecting to Debtor's Discharge under 11 U.S.C. §§523 and 727 of the Bankruptcy Code.

In support of such motion, the movant submits the following:

1. The Debtor filed the above-referenced bankruptcy case on April 24, 2017 under Chapter 7 of the U.S. Bankruptcy Code.
2. A Meeting of Creditors under §341 of the Code was scheduled to be conducted on May 30, 2017 at 10:30 a.m.

3. Neither Debtor nor his Counsel of Record appeared at the regularly scheduled Meeting of Creditors.

4. Under the applicable Notice of Chapter 7 Bankruptcy Case, and pursuant to Bankruptcy Rules 4004 and 4007, the deadline to object to the Debtor's Discharge is July 31, 2017, the date which is 60 days after the date first set for the meeting of Creditors under §341 of the Code.

5. At the originally scheduled Meeting of Creditors, the Chapter 7 Trustee announced that he would not be recommending dismissal of the case for failure of the Debtor and Counsel to appear. The Trustee announced the meeting would be continued to June 29, 2017. Thereafter, further notice of the date and time for the continued meeting of creditors was communicated by the Trustee through the ECF Court noticing program.

6. Following the date scheduled for the original Meeting of Creditors, Debtor filed a Motion to Convert the case to one being administered under Chapter 13 of the Bankruptcy Code. That Motion was ultimately denied by the Court on June 30, 2017.

7. Debtor filed an *ex-parte* Motion to Continue and Reschedule the continued Meeting of Creditors. Such motion was scheduled for hearing before the Court on June 30, 2017.

8. Despite the Court not executing the Debtor's pending *ex-parte* Motion to Continue and Reschedule the continued Meeting of Creditors, neither Debtor nor his Counsel appeared at the second scheduled Meeting of Creditors which was scheduled for June 29, 2017.

9. At the hearing in the matter conducted on June 30, 2017, the Court formally denied the Debtor's Motion to Continue and Reschedule the continued meeting of Creditors, and Ordered the Debtor to appear at the next scheduled Meeting of Creditors.

10. A third Meeting of Creditors was scheduled to be conducted on July 20, 2017. At the scheduled time, Debtor appeared, but his legal Counsel did not. The Chapter 7 Trustee once again announced his intention not to seek dismissal of the case; but rather to conduct a more detailed Meeting of Creditors in his office rather than as part of a typical calendar of §341 meetings which would confine him to limited amount of time to question the Debtor. The Trustee indicated an intention to attempt to determine a mutually acceptable time that all the parties-in-interest would be available; but, if that were not successful, he would simply notice the date and time when it would be convenient for him and his office.

11. Legal Counsel for the Creditor, Farhad Iravani, has been required to appear at two separate scheduled Meetings of Creditors; and, will be compelled to attend at least one more before even the initial questioning of the Debtor will be capable of being completed. Such appearances have caused substantial additional costs to be thrust upon the Creditor, all due to the failure of the Debtor and his Counsel to comply with the expectations under the Bankruptcy Code.

12. The deadline to commence Complaints under §§523 and 727 of the Bankruptcy Code is July 31, 2017, a date by which no Meeting of Creditors will have been conducted in the present matter.

13. Debtor has likewise previously identified the appropriateness of extending the deadlines for filing objections to dischargeability. (*See*: ¶7 Docket No. 24: Debtor's Motion to Continue and Reschedule 341)

14. Given the totality of the circumstances, Court should extend the deadline for filing Complaints Objecting to Discharge, exemptions, and other relevant deadlines under the

circumstances that the Debtor has failed to cooperate in the prosecution of his Chapter 7 Bankruptcy petition.

BASED UPON THE FOREGOING, the Creditor, Farhad Iravani, pursuant to Bankruptcy Rules 4004(b) and 4007(c), hereby respectfully moves the Court to extend the time for filing Complaints Objecting to Debtor's Discharge under 11 U.S.C. §§523 and 727 of the Bankruptcy Code to the date which is sixty (60) days after the conclusion of the anticipated Meeting of Creditors to be conducted in the case.

RESPECTFULLY SUBMITTED AND DATED this 26th day of July, 2017.

/s/ Jory L. Trease
Jory L. Trease
Attorney for Creditor, Farhad Iravani

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2017, I electronically filed the foregoing **CREDITOR'S MOTION TO EXTEND DEADLINES UNDER 11 U.S.C. §§523 AND 727**, with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case as identified below, are registered CM/ECF users and will be served through the CM/ECF system.

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By U.S. mail – I further certify that on July 26, 2017, I caused the foregoing document to be sent by United States mail, first class postage prepaid, to the following at the addresses set forth below:

☐ NONE

☒ Manual Notice List:

Farhad Iravani (via email)
372 Camino Carta
San Marcos, CA 92078

☐ All parties on the Court's official case matrix (attached)

/s/ Jory L. Trease

Iravani.Mtn2ExtendDeadlines.wpd
JLT/dm